



DISABILITY AND COMMUNICATION ACCESS BOARD

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INTERPRETIVE OPINION

Pursuant to §103-50, Hawaii Revised Statutes (HRS), all buildings and facilities constructed by, or on behalf of the State or any county, shall conform to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) and amendments. In accordance to HRS §103-50 and Chapter 11-217, Hawaii Administrative Rules, the Disability and Communication Access Board has authority to issue interpretive opinions to HRS §103-50 design standards.

Docket: **DCAB 2001-11:** Interpretive Opinion on ADAAG 4.3.6 Surface Textures, and 4.5.1 Ground and Floor Surfaces. Is grass used as an accessible route considered to be firm, stable and slip-resistant?

Summary: There are many variables that affect a walking surface – slope, cross-slope, material, texture and finish, the presence of moisture or contaminants, the material that contacts it, and the method of ambulation. There is no single set of technical specifications or measurement standards that can encompass all the criteria that contribute to the safety of a walking surface. When used in, e.g., a park, grass is ineffective as a walking surface since it does not have discernable outlines, it depends on the type of grass used and the soil condition, it may be firm until it rains, and maintenance may not be consistent.

Ruling: For buildings or facilities subject to HRS § 103-50,

ADAAG 4.3.6 Surface Textures, and 4.5.1 Ground and Floor Surfaces

Grass, by itself, cannot be used as an accessible route.

[Rul: 09/01] (Auth and Imp: HRS §103-50)

If you have any questions or comments regarding this ruling, please call us at 586-8121.

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